



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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7/16/92

REF: 4WD-SSRB

James C. Brown, Manager
Environmental Affairs Department
Olin Chemicals
Post Office Box 248
Charleston, Tennessee 37310

RE: Olin Corp./McIntosh Plant Superfund Site
McIntosh, Alabama -- Source Evaluation Technical Memorandum

Dear Mr. Brown:

Please find enclosed comments on the Source Evaluation Technical Memorandum dated November 1991. The document identified problem source areas. These areas will require additional sampling before EPA can approve this document. Consequently, I would like to tentatively schedule a meeting during the week of February 10, 1992 to scope out the next round of sampling that will clarify all areas of concern.

Please provide a line-by-line response to each comment on or before February 7, 1992. These comments need to be addressed in preparation for the next major deliverable - the Preliminary Site Characterization Summary due in this office on or before April 16, 1992. Please contact me as soon as possible to verify your availability.

If there are any questions, please do not hesitate to give me a call at (404)347-2643.

Sincerely,

Cheryl W. Smith
Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Joe Downey, ADEM

TECHNICAL REVIEW COMMENTS
SOURCE EVALUATION TECHNICAL MEMORANDUM
OLIN CORP./MCINTOSH PLANT

GENERAL COMMENTS

1. Demonstrate that the presence of mercury throughout the soil column is slowly being removed by the corrective action wells.
2. Demonstrate whether or not the Old Plant (CPC) Landfill area is a continuing source of mercury contaminated groundwater and organic compounds.
3. Determine the source of volatile concentrations measured in monitoring well PL-10S.
4. There is a need for delineation of wells corresponding to the specific Solid Waste Management Unit that they are monitoring.

SPECIFIC COMMENTS

1. Page 6: The current list of Solid Waste Management Units (SWMUs) identified in the Administrative Order on Consent (AOC) is currently inconsistent with the results from the RCRA Facility Assessment (RFA) dated August 19, 1991. The additional SWMUs identified in the RFA will need further evaluations. Confirmatory sampling for both groundwater and soils will have to be performed on those areas that EPA feels have not been adequately addressed.
2. Page 24: Confirmatory sampling will be required on the ash used as fill material at the Hexachlorobenzene Spoil Area (Hex Spoil Area). 40 CFR 257, Subtitle D disallows the use of solid waste materials as fill material. In addition, the Toxicity Characteristic Leaching Procedure (TCLP) only determines whether or not a material should be handled as a hazardous waste. The Hex Spoil Area must be tested using the total constituent list to adequately determine if the ash material poses a threat to human health and/or the environment.
3. Section 4.2: The isoconcentration maps in Appendix D and Appendix E are very difficult to interpret. A facility overlay should be incorporated into the isoconcentration maps to determine the estimated extent of contaminants as it relates to the facility boundary, corrective action wells, SWMUs, etc.

The isoconcentration diagrams do not completely track the extent of contamination. The extent of contamination must be completely identified even if it means going outside of the current facility's boundary limits.

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4. Table 3: A determination must be made as to the reliability of the current well system since these wells will be used in future sampling.
5. Figures 7 - 29: The time vs. concentration analysis is not conclusive. The overall trend of the groundwater contaminant flow is unclear from this analysis. The adequacy of the current groundwater extraction system is inconclusive and it seems that this system is not sufficiently capturing the contaminant plume(s).